

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

FCS ADVISORS, LLC,

Plaintiff,

—against—

21 Civ. 6995 (PKC)

THEIA GROUP, INC., d/b/a “THORIAN GROUP”
and/or “CYPHERIAN”; THEIA AVIATION, LLC;
and THEIA HOLDINGS A, INC., d/b/a “THORIAN
HOLDINGS,”

Defendants.

**NOTICE OF MOTION OF RECEIVER FOR ENTRY AN ORDER
AUTHORIZING AND APPROVING LETTER AGREEMENT BY AND AMONG
RECEIVER, BASLER TURBO CONVERSIONS, L.L.C., AND LTS SYSTEMS, LLC**

PLEASE TAKE NOTICE that, upon the accompanying *Memorandum of Law*, Michael Fuqua, as receiver (the “Receiver”) for Theia Group, Inc., Theia Aviation LLC, and Theia Holdings A, Inc., by and through his counsel, will move the Court, before the Honorable P. Kevin Castel, United States District Judge for the Southern District of New York, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, NY 10007-1312, for an order authorizing and approving a letter agreement by and among the Receiver, Basler Turbo Conversions, L.L.C., and LTS Systems, LLC.

PLEASE TAKE FURTHER NOTICE that, pursuant to Federal Rule of Civil Procedure 6(d) and Rule 6.1(b) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, opposing affidavits and answering memoranda must be filed within seventeen (17) days of the date of this Notice of Motion.

Dated: May 17, 2024
New York, New York

Respectfully submitted,

KING & SPALDING LLP

By: /s/ Kevin O'Brien
Kevin O'Brien (SBN 5983713)
KING & SPALDING LLP
1185 Avenue of the Americas, 34th Floor
New York, New York 10036
Telephone: (212) 556-2100
Facsimile: (212) 556-2222
E-mail: kobrien@kslaw.com

-and-

Thaddeus D. Wilson
KING & SPALDING LLP
1180 Peachtree Street NE
Atlanta, Georgia 30309
Telephone: (404) 572-4600
Facsimile: (312) 572-5100
Email: thadwilson@kslaw.com

*Counsel for Michael Fuqua, in his capacity as
Receiver of Theia Group, Inc., Theia Aviation, LLC,
and Theia Holdings A, Inc.*